

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

ASHLEY BOSHEA, ADMINISTRATOR OF  
THE ESTATE OF DAVID JOHN BOSHEA,

*Plaintiff,*

v.

COMPASS MARKETING, INC.,

*Defendant.*

Civil No. ELH-21-309

**CONSENT MOTION FOR EXTENSION TO FILE REPLY BRIEF IN SUPPORT OF  
MOTION FOR RELIEF FROM A JUDGMENT, OR,  
IN THE ALTERNATIVE, FOR A NEW TRIAL**

Defendant Compass Marketing, Inc. (“Compass Marketing”), by and through its undersigned counsel and with the consent of counsel for Plaintiff Ashley Boshea, as Administrator of the Estate of David John Boshea (“Boshea”),<sup>1</sup> respectfully requests that the Court extend the time to file Compass Marketing’s Reply Brief in Support of its Motion for Relief From a Judgment or, in the Alternative, for a New Trial. In support, Compass Marketing states the following.

1. On September 10, 2025, Compass Marketing filed a Motion for Relief from a Judgment, or, in the Alternative, for a New Trial (the “Motion for Relief from Judgment”). *See* ECF 370.

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<sup>1</sup> David J. Boshea, the original Plaintiff in this case, passed away on January 28, 2025. Thereafter, Mr. Boshea’s daughter, Ashley Boshea, as Administrator of the Estate of Mr. Boshea, was substituted as the named Plaintiff. For ease of reference, this filing continues to refer to *Plaintiff* as “Boshea,” and references herein to “Boshea” should be understood to include the Estate of David J. Boshea, by and through its Administrator.

2. On September 25, 2025, Boshea filed a Response to Motion Defendant Compass Marketing Inc.'s Motion for Relief from a Judgment, or, in the Alternative, for a New Trial (the "Opposition"). *See* ECF 374.<sup>2</sup>

3. As of the filing of this Motion, Compass Marketing's Reply brief in support of its Motion for Relief from Judgment is due on October 8, 2025.

4. Since the filing of the Opposition, lead undersigned counsel (Mr. Stern) has been largely unavailable due to religious holidays and other commitments, and co-counsel (Ms. Hayden) has largely been unavailable in celebration of her wedding. Ms. Hayden is due to return to the office on October 13, 2025.

5. In light of undersigned counsel's schedule limitations during the period between the filing of the Opposition and the date on which the Reply brief would be due, Compass Marketing's counsel requested an extension of time to submit Compass Marketing's Reply brief by October 20, 2025. Boshea's counsel consented to the requested relief (and has seen a copy of this Motion prior to its filing).

6. Neither the parties, nor the Court, will be prejudiced by the requested extension being granted.

WHEREFORE, for the foregoing reasons, the Court should grant Compass Marketing's Motion for Extension to File Reply Brief in Support of Motion for Relief from a Judgment, or, in the Alternative, for a New Trial and order that Compass Marketing may file its Reply brief on or before October 20, 2025.

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<sup>2</sup> The Opposition was due on September 24, 2025. It appears the Opposition was filed approximately two minutes after the deadline and Compass Marketing has consented to Boshea's request to have the Opposition deemed timely filed.

Dated: October 8, 2025

Respectfully submitted,

/s/Stephen B. Stern

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*Counsel for Defendant  
Compass Marketing, Inc.*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 8th day of October, 2025, the foregoing Motion for Extension to File Reply Brief in Support of Motion for Relief from a Judgment, or, in the Alternative, for a New Trial was served via the CM/ECF system on the following counsel of record:

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*Attorneys for Plaintiff  
David Boshea*

/s/Stephen B. Stern

Stephen B. Stern